

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LEON WEINGRAD, et al.	:	
	:	Civil Case No. 2:24-CIV-4716
vs.	:	
	:	
FUND MATE, LLC	:	
and	:	
MENACHEM MINSKY	:	

Objection Made to Plaintiff's Request for Enlargement of Time to Respond
to a Pending R.12(b)(5) Motion

1. Defendants respectfully suggest that “the press of existing prior business and obligations” did not prevent their counsel from filing this Motion within one-day of being engaged. See, *Rule 11 Good Faith Statement @ a. & b.*
2. Plaintiff's counsel did not inquire whether defendants would concede to this request.
3. The Motion at issue was filed on 14 May 2025 and the Brief does not alter this.
4. The Motion at issue consists of only nine (9) paragraphs, four (4) paragraphs of which are simple recitations of law, and his filed “Affidavit of Substitute Service” will not change.
5. Defendant suggests that plaintiff's counsel could well timely address this Motion, had he wanted to do so.

Respectfully submitted,

scott miller

Scott E. Miller, Esquire

May 26, 2025